

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
(Lynchburg Division)**

TRE'MANE FUQUA,

Plaintiff,

v.

CENTRA HEALTH, INC., et al.

Defendants.

Case No. 6:23-cv-00065

**CONSENT MOTION FOR EXTENSION OF TIME FOR
DEFENDANT CENTRA HEALTH, INC. TO FILE RESPONSIVE PLEADINGS**

Defendant Central Health, Inc. (“Centra”), by and through undersigned counsel, and pursuant to Federal Rule of Civil Procedure 6(b), hereby files this Consent Motion respectfully requesting that the Court enter an Order extending the time for the Centra to file its responsive pleadings. In support of the requested relief, Centra states as follows:

1. Plaintiff Tre'Mane Fuqua (“Plaintiff”) served Centra with the Complaint in this case on January 11, 2024.
2. Pursuant to the Court’s January 31, 2024 Order (ECF No. 8) and the consent of both parties, Centra’s responsive pleadings are due on March 1, 2024.
3. Centra is in the process of reviewing its file and needs additional time to determine whether certain defenses should be asserted under Federal Rule of Civil Procedure 12(b).
4. Plaintiff’s counsel has consented to Centra’s request to extend its responsive pleadings deadline to April 1, 2024.

WHEREFORE, Centra respectfully requests that the Court enter an Order extending its responsive pleading deadline to April 1, 2024.

Dated: February 27, 2024

Respectfully submitted,

CENTRA HEALTH, INC.

/s/Matthew W. Lee

Matthew W. Lee (VSB No. 40067)

WILSON ELSEER MOSKOWITZ

EDELMAN & DICKER LLP

8444 Westpark Drive

Suite 510

McLean, VA 22102-5102

Phone: (703) 852-7788

Fax: (703) 245-9301

matthew.lee@wilsonelser.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 27th day of February, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Matthew W. Lee
Matthew W. Lee